

# **EXHIBIT A**

## Plaintiffs' and Defendants' Proposed Case Schedules

*N.Z., et al. v. Fenix International Limited, et al.*

Central District of California, Case No. 8:24-cv-01655-FWS-SSC

| Event   | Plaintiffs' Proposed Dates   | Defendants' Proposed Dates   |
|---|--|--|
| Motions to Dismiss  | Motion: 30 days after Plaintiffs file an amended complaint, or 14 days after Plaintiffs notify Defendants they do not intend to amend their complaint, per Court's October 28 Order Sequencing Dispositive Motions, ECF No. 68 ("October 28 Order").<br>Responses: 35 days after motion<br>Reply: 28 days after response |  |
| Start of discovery  | 03/13/2025   | 06/05/2025   |
| Initial Disclosure Deadline   | 03/13/2025   | 07/05/2025   |
| Deadline to file Motion to Amend Pleadings/Add Parties                                  | Motion: 08/05/2025<br>Responses: 09/02/2025<br>Reply: 09/23/2025   | Motion: 08/05/2025<br>Responses: 09/02/2025<br>Reply: 09/23/2025<br>Note: This does not affect the schedule found in the Court's October 28 Order. |
| Last day to hear Motion to Amend Pleadings/Add Parties                                  | 10/23/2025   | 10/23/2025   |
| Class Certification Expert Disclosures, including service of expert reports if required | Initial: 02/05/2026<br>Rebuttal: 03/19/2026  | Initial: 02/05/2026<br>Rebuttal: 03/19/2026  |
| Class Certification Expert Discovery Cutoff   | 05/04/2026   | 05/04/2026   |

|   |   |   |
|---|---|---|
| Class Certification Motion  | Motion: 06/04/2026<br>Response: 07/09/2026<br>Reply: 08/06/2026 | Motion: 06/04/2026<br>Response: 07/09/2026<br>Reply: 08/06/2026 |
| Last day to hear Class Certification Motion                         | 09/03/2026  | 09/03/2026  |
| Fact Discovery Cutoff   | 02/18/2027  | 11/12/2026  |
| Expert Disclosures, including service of expert reports if required | Initial: 11/19/2026<br>Rebuttal: 01/07/2027                     | Initial: 11/19/2026<br>Rebuttal: 01/07/2027                     |
| Expert Discovery Cutoff   | 02/18/2027  | 02/18/2027  |
| Dispositive and <i>Daubert</i> Motion Deadlines                     | Motion: 03/04/2027<br>Response: 04/08/2027<br>Reply: 05/06/2027 | Motion: 03/04/2027<br>Response: 04/08/2027<br>Reply: 05/06/2027 |
| ADR Deadline  | 05/20/2027  | 05/20/2027  |
| Last day to hear Dispositive and <i>Daubert</i> Motions             | 05/27/2027  | 05/27/2027  |
| Trial Filings (first round)   | 07/29/2027  | 07/29/2027  |
| Trial Filings (second round)  | 09/02/2027  | 09/02/2027  |
| Pretrial Conference   | 09/16/2027  | 09/16/2027  |
| Trial   | 10/05/2027  | 10/26/2027  |